

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NICHOLAS M. SCHUCH, SR.	:	
3237 Pasqualone Boulevard	:	CIVIL NO. 02-CV-4584
Bensalem, Pennsylvania 19020	:	
	:	
Plaintiff,	:	
	:	
versus	:	
	:	
ALLSTATE INSURANCE COMPANY	:	
1301 Virginia Drive	:	
Fort Washington, Pennsylvania 19034	:	
	:	
Defendant.	:	

ORDER

AND NOW, this _____ day of _____, 2003, upon consideration of the Motion for Extension of Time to complete discovery and file dispositive motions filed by Defendant, Allstate Insurance Company, it is hereby ORDERED that:

Defendant, Allstate Insurance Company, is hereby granted an additional thirty (30) days from the signing of this Order within which to complete all discovery and sixty (60) days to file any dispositive motions in this matter.

BY THE COURT:

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NICHOLAS M. SCHUCH, SR.
3237 Pasqualone Boulevard
Bensalem, Pennsylvania 19020

Plaintiff,

versus

ALLSTATE INSURANCE COMPANY
1301 Virginia Drive
Fort Washington, Pennsylvania 19034

Defendant.

CIVIL NO. 02-CV-4584

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION
OF TIME FOR DISCOVERY AND DISPOSITIVE MOTIONS**

COMES NOW DEFENDANT, ALLSTATE INSURANCE COMPANY ("Allstate"), who respectfully requests an extension of time for discovery of thirty (30) days and sixty (60) days for dispositive motions. Plaintiff, Nicholas Schuch, was originally a Pro Se plaintiff and now has an attorney. Mr. Kale enrolled as counsel of record on _____. A deposition of the Plaintiff was set for March 10, 2003 at 10:00 a.m. The deposition was stopped due Plaintiff's counsel's other commitments that afternoon. The deposition was continued to March 28, 2003. The deadline for discovery in this matter is presently set for March 17, 2003. Plaintiff's counsel agreed to continue the Plaintiff's deposition and has agreed to the extension of time for discovery and dispositive motions. Further, Plaintiff has still not provided answers to Defendant's written discovery, which may provide information to other individuals that may need to be deposed. Based on the present posture of this case, Defendant respectfully requests an additional thirty (30) days to complete discovery and sixty (60) for dispositive motions. Counsel for Defendant had conferred with Plaintiff's counsel who consents to the extension of time.

WHEREFORE, Defendant Allstate Insurance Company, prays that this Court issue an Order extending the deadline for discovery for thirty (30) days and all pre-trial motions for sixty (60) days.

Respectfully Submitted,

DANIEL KREBBS
MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN
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Date: _____
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CERTIFICATE

This is to certify that a true and correct copy of the foregoing was served by United States mail, first class, postage paid, to the parties listed below on this _____ day of March, 2003.

Jeffrey N. Kale
Law Offices of Jeffery Kale
117 South 17th Street, Suite 1100
Philadelphia, PA 19103

DANIEL D. KREBBS, ESQUIRE

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